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IN THE CIRCUIT COURT OF POPE COUNTY, ARKANSAS
____ DIVISION

Randall Robertson and Julian A. Graves, both
individually and on behalf of a class of
similarly situated individuals,

Plaintiffs,

v.

Family Dollar Stores of Arkansas, LLC
Family Dollar Services, LLC,

Defendants.

Case No. 58CV-22-_____

DEMAND FOR JURY TRIAL

CLASS ACTION COMPLAINT

Plaintiffs Randall Robertson and Julian A. Graves ("Plaintiffs"), individually and on behalf of all others similarly situated, by and through their undersigned counsel, bring this Class Action Complaint against Defendant Family Dollar Stores of Arkansas, LLC and Defendant Family Dollar Services, LLC (collectively referred to as "Family Dollar" or "Defendants"), and complain and allege upon personal knowledge as to themselves and their own acts and experiences and, as to all other matters, upon information and belief, including investigation conducted by their counsel as follows:

PARTIES

1. Plaintiffs are, and at all relevant times have been, citizens of Pope County Arkansas. Plaintiffs purchased Contaminated Products from one of Family Dollar's Affected Stores in Pope County, Arkansas on multiple occasions between January 1, 2021 and February 18, 2022. Plaintiffs suffered actual financial loss as a result of their purchase of the Contaminated Products.

2. Defendant Family Dollar Stores of Arkansas, LLC was incorporated in Virginia

and has its principal place of business at 500 Volvo Pkwy in Chesapeake, Virginia, 23320. It is licensed to do business in Arkansas and can be served via its registered agent Corporation Service Company at 300 Spring Building, Ste. 900 in Little Rock, Arkansas, 72201.

3. Defendant Family Dollar Services, LLC was incorporated in North Carolina and has its principal place of business at 500 Volvo Pkwy in Chesapeake, Virginia, 23320. It is licensed to do business in Arkansas and can be served via its registered agent Corporation Service Company at 300 Spring Building, Ste. 900 in Little Rock, Arkansas, 72201.

JURISDICTION AND VENUE

4. Pursuant to Ark. Code Ann. § 16-4-101, the Court has jurisdiction over Defendant Family Dollar Stores of Arkansas, LLC and Defendant Family Dollar Services, LLC because they are licensed to do business in Arkansas and regularly conducts business in Arkansas.

5. Venue lies in this Court pursuant to Ark. Code Ann. § 16-60-101 as a substantial part of the events or omissions that form the basis of this Class Action Complaint occurred in Pope County, Arkansas, Defendants conducted activity that gave rise to the claims for relief in this County, and Plaintiff resides in this County.

FACTUAL ALLEGATIONS

6. On Friday, February 18, 2022, the U.S. Food and Drug Administration (“FDA”) issued a safety information news release titled, “FDA Alerts the Public to Potentially Contaminated Products from Family Dollar Stores in Six States” (the “FDA Safety Alert”) after an FDA inspection found insanitary conditions, including a rodent infestation, that could cause many of the products stored there to become contaminated.¹ A copy of the FDA’s Safety Alert is attached hereto as **Exhibit A**.

¹ Safety Information News Release, *FDA Alerts the Public to Potentially Contaminated Products from Family Dollar Stores in Six States*, FDA, Feb. 18, 2022, available at <https://www.fda.gov/news-events/press-announcements/fda->

7. The impacted products originated from the Family Dollar Distribution Center 202 located at 1800 Family Dollar Pkwy in West Memphis, Arkansas, 72301 (the “West Memphis Distribution Center”). The West Memphis Distribution Center is approximately 850,000 square feet, has approximately 500 employees, and services stores in Arkansas, Louisiana, Texas, Oklahoma, Missouri, Illinois, Kentucky, Tennessee, Georgia, Alabama, and Mississippi.² The West Memphis Distribution Center is depicted below:³



8. In early January 2022, Robert Bradford, then a Family Dollar employee at the West Memphis Distribution Center, posted videos and photographs of numerous rats inside the building, some of which were obtained by local news station WREG.⁴ Mr. Bradford claims he was fired after posting a video of him trying to feed a rat online and stated the rats were everywhere inside

alerts-public-potentially-contaminated-products-family-dollar-stores-six-states. (**Exhibit A**).

² <https://www.familydollar.com/locations/ar/west-memphis/dc202/>.

³ *Id.*

⁴ Melissa Moon, *Another complaint about rats at Family Dollar Facilities*, WREG Memphis, Jan. 4, 2022, available at <https://wreg.com/news/local/another-complaint-about-rats-at-family-dollar-facilities/>.

the warehouse: “There are sixty-one aisles in the warehouse; you are going to see them from one to sixty-one. They are running around. They are on the floor, and they are in boxes.”

9. Photos captured from Mr. Bradford’s video and featured WREG Memphis are below:⁵



⁵ *Id.*

10. WREG Memphis and other news outlets have continued to feature videos of rats from inside the West Memphis Distribution Center:⁶



⁶ See e.g. Jordan James, *Over 1,000 dead rodents found at Family Dollar distribution center*, WREG Memphis, Feb. 19, 2022, available at <https://wreg.com/news/local/over-1000-dead-rodents-found-at-family-dollar-distribution-center/>.

11. Around the same time in early January 2022, following a consumer complaint, the FDA began investigating the West Memphis Distribution Center.⁷ Shortly after the FDA inspection team's arrival on-site, Family Dollar ceased distribution of products from the West Memphis Distribution Center. The inspection concluded on February 11, 2022.

12. Seven days later, the inspection findings were described in the FDA Safety Alert:

Conditions observed during the inspection included *live rodents, dead rodents in various states of decay, rodent feces and urine, evidence of gnawing, nesting and rodent odors throughout the facility, dead birds and bird droppings, and products stored in conditions that did not protect against contamination*. More than *1,100 dead rodents* were recovered from the facility following a fumigation at the facility in January 2022. Additionally, a review of the company's internal records also indicated the collection of more than *2,300 rodents* between March 29, 2021 and September 17, 2021, demonstrating a history of infestation.

(emphasis added).

13. "Families rely on stores like Family Dollar for products such as food and medicine. They deserve products that are safe," said Associate Commissioner for Regulatory Affairs Judith McMeekin, Pharm.D.⁸ "No one should be subjected to products stored in the kind of unacceptable conditions that we found in this Family Dollar distribution facility. These conditions appear to be violations of federal law that could put families' health at risk. We will continue to work to protect consumers."

14. According to the FDA, there are numerous hazards associated with rodents including the potential presence of Salmonella.⁹ Use or consumption of affected products may present risk of illness due to the potential presence of Salmonella, an organism which can cause serious and sometimes fatal infections in infants, young children, frail or elderly people, pregnant

⁷ Safety Information News Release, *FDA Alerts the Public to Potentially Contaminated Products from Family Dollar Stores in Six States*, FDA, Feb. 18, 2022, available at <https://www.fda.gov/news-events/press-announcements/fda-alerts-public-potentially-contaminated-products-family-dollar-stores-six-states>. (Exhibit A).

⁸ *Id.*

⁹ *Id.*

persons, persons with pre-existent pathology (e.g., patients with cancer undergoing chemotherapy treatments, organ transplant recipient, etc.) and others with weakened immune systems. Healthy persons infected with *Salmonella* often experience fever, diarrhea (which may be bloody), nausea, vomiting and abdominal pain. In rare circumstances, infection with *Salmonella* can result in the organism getting into the bloodstream and producing more severe illnesses such as arterial infections (i.e., infected aneurysms), endocarditis and arthritis.

15. Because of the unsanitary conditions, rodent infestation, and related health hazards, the FDA advised that all FDA-regulated products sold by certain Family Dollar stores in Alabama, Arkansas, Louisiana, Mississippi, Missouri and Tennessee from January 1, 2021, through present are not fit for human use or consumption, including:

- **Human foods** (including dietary supplements (vitamin, herbal and mineral supplements));
- **Cosmetics** (skincare products, baby oils, lipsticks, shampoos, baby wipes), animal foods (kibble, pet treats, wild bird seed);
- **Medical devices** (feminine hygiene products, surgical masks, contact lens cleaning solutions, bandages, nasal care products);
- **Over-the-counter (OTC) medications** (pain medications, eye drops, dental products, antacids, other medications for both adults and children); and
- **Any other FDA-regulated products.**¹⁰

Collectively, these products are referred to as “the Contaminated Products” herein.

16. The conditions at the West Memphis Distribution Center were such that all products in the categories noted above were deemed contaminated by the FDA, regardless of whether the product packaging showed signs of contact with rodents, birds, or their excrement or the packaging itself actually came into contact with the rodents, birds, or excrement. All of the Contaminated Products were considered dangerous and unfit for human consumption or use due to the manner in which they were stored at the West Memphis Distribution Center.

¹⁰ *Id.*

17. The FDA Safety Alert warned that anyone who purchased a Contaminated Product and experiences health concerns should contact a health care professional right away.¹¹ For individuals who still have Contaminated Products in their homes, the FDA advised that these products should be thrown away:

Consumers are advised not to use and to contact the company regarding impacted products. The agency is also advising that *all drugs, medical devices, cosmetics, and dietary supplements, regardless of packaging, be discarded. Food in non-permeable packaging (such as undamaged glass or all-metal cans) may be suitable for use if thoroughly cleaned and sanitized.* Consumers should wash their hands immediately after handling any products from the affected Family Dollar stores.¹²

(emphasis added).

18. After the FDA Safety Alert, Family Dollar issued a “voluntary recall.”¹³ Family Dollar’s Recall Notice is attached hereto as **Exhibit B**. The Recall Notice advises that “[c]ustomers that may have bought affected product *may return such product* to the Family Dollar store where they were purchased without receipts.” Family Dollar’s Recall Notice indicates that “[p]roducts shipped directly to the store by the distributor or manufacturer aren’t included, such as all frozen and refrigerated items.”

¹¹ *Id.*

¹² *Id.*

¹³ Press Release, *Family Dollar Stores Issues Voluntary Recall of Certain FDA-Regulated Products in Six States Including Drugs, Devices, Cosmetics, Foods*, Business Wire, Feb. 18, 2022, available at <https://www.businesswire.com/news/home/20220218005563/en/Family-Dollar-Stores-Issues-Voluntary-Recall-of-Certain-FDA-Regulated-Products-in-Six-States-Including-Drugs-Devices-Cosmetics-Foods>. (**Exhibit B**).

19. In addition to its Recall Notice, Family Dollar was forced to close the 404 stores that received shipments from the West Memphis Distribution Center (“the Affected Stores”):¹⁴



Family Dollar’s List of 404 Affected Stores is attached hereto as **Exhibit C**.

20. Plaintiffs and Class Members relied upon representations by Family Dollar concerning the safety and quality of its products.

21. Plaintiffs and Class Members paid money for the Contaminated Products.

22. The unsanitary condition of the Contaminated Products manifested before the Products were purchased by Plaintiff and Class Members.

23. Because of the multitude of health hazards associated with a rodent infestation, the Contaminated Products are worthless, and Plaintiff and Class Members did not receive any benefit from the Contaminated Products.

¹⁴ Vimal Patel, *Rodent Infestation at Family Dollar Warehouse Leads to Hundreds of Closures*, NY Times, Feb. 19, 2022, available at <https://www.nytimes.com/2022/02/19/us/fda-family-dollar-recall.html>; Annabelle Timsit, *Family Dollar closes 400 stores, recalls products after FDA finds decaying dead rodents in warehouse*, WA Post, Feb. 20, 2022, available at <https://www.washingtonpost.com/nation/2022/02/20/family-dollar-recall-fda-rodents/>; Parker King, et al., *Hundreds of Family Dollar stores closed due to rodent infestation*, WDTV West Memphis, AK, Feb. 20, 2022, available at <https://www.wdtv.com/2022/02/20/hundreds-family-dollar-stores-closed-due-rodent-infestation/>.

24. Because the Contaminated Products came into contact with other products in Plaintiff and Class Members' homes, Plaintiffs and Class Members must discard additional products as well.

25. Family Dollar unreasonably delayed issuing a recall of the Contaminated Products. Family Dollar has been aware of the problems with the West Memphis Distribution Center since at least September 2021 and the rodent infestation and unsanitary conditions described by the FDA must have been obvious to all those that entered the facility.

26. There is evidence that Family Dollar was on notice about issues with rats long before September 2021, as Family Dollar has a disturbing history of rat infestations in its stores throughout the country.¹⁵

27. Family Dollar concealed the truth about the conditions of the West Memphis Distribution Center in order to remain operational and continue to sell the Contaminated Products but failed to take reasonable steps to remedy the rodent infestation. As a result, consumers continued purchasing Contaminated Products.

¹⁵ Michele Reese, *Complaints Lead to Deep Cleaning at Downtown Family Dollar*, WREG Memphis, Jan. 27, 2014, available at <https://wreg.com/news/complaints-lead-to-deep-cleaning-at-downtown-family-dollar/>; WRIC Newsroom, *2 local Family Dollar stores shut down to deal with rat infestations after 8News investigation*; WRIC News, June 19, 2018, available at <https://www.wric.com/news/taking-action/2-local-family-dollar-stores-shut-down-to-deal-with-rat-infestations-after-8news-investigation/>; Tom Sussi, *Rodent infestation forces Family Dollar store to close*, NBC4, Oct. 17, 2018, available at https://www.nbc4i.com/news/investigates/up-to-code/rodent-infestation-forces-family-dollar-store-to-close/1531687075/?fb_comment_id=2191038777594942_2191103297588490; Darcy Spears, *Rats land 2 Family Dollar Stores on Dirty Dining*, KTNV, May 1, 2019, available at <https://www.ktnv.com/dirtydining/rats-land-two-family-dollar-stores-on-dirty-dining>; Sarafina Jones, *Man claims rat infestation at Polk County Family Dollar*, WFLA, Auburndale, Fla., Jun. 17, 2019, available at <https://www.wfla.com/news/polk-county/man-claims-rat-infestation-at-polk-county-family-dollar/2081920910/>; Luke Jones, *Inspection report reveals disturbing details about rat infestation at Family Dollar store*, WREG Memphis, Jul. 23, 2019, available at <https://wreg.com/news/inspection-report-reveals-disturbing-details-about-rat-infestation-at-family-dollar-store/>; Sierra Webster, *Rat Infestation Shuts Down Family Dollar in Cobb County*, The Atlanta Journal Constitution, July 29, 2019, available at <https://www.ajc.com/news/breaking-news/rat-infestation-shuts-down-family-dollar-cobb-county/5ZADCF7OcO9IRL4FQ87LAI/>; Bria Jones, *Family Dollar worker says store infested with rats*, WREG Memphis, Jan. 3, 2022, available at <https://wreg.com/news/local/family-dollar-worker-says-store-infested-with-rats#:~:text=In%20these%20photos%20you%20can,at%204100%20South%20Plaza%20Drive.&text=The%20employee%20who%20wants%20to,store%20through%20shipments%20dropped%20off.?ipid=promo-link-block1>.

28. Even after an extraordinary delay, Plaintiffs and Class Members are not aided by Family Dollar's recall for three reasons:

- a. Family Dollar requires customers to return the Contaminated Products to receive a refund, even though the FDA Safety Alert advised customers to immediately throw away the Contaminated Products.
- b. Family Dollar requires customers to return the Contaminated Products to the "store where they were purchased," even though, as of filing, the Affected Stores are closed.
- c. Family Dollar does not include "products shipped directly to the store by the distributor or manufacturer" in the recall but does not specify which products are included in this category.

29. Plaintiffs have provided Defendants pre-suit notice of Defendants' breach of the implied warranty of merchantability and violation of the Arkansas Deceptive Trade Practices Act.

CLASS ACTION ALLEGATIONS

30. **Class Definition:** Plaintiffs bring this action pursuant to Ark. R. Civ. P. 23, on behalf of themselves and a class of similarly situated individuals ("the Class"), defined as follows:

All persons who were or are citizens of the State of Arkansas who, from January 1, 2021, through the February 18, 2022, purchased one of the Contaminated Products for household or business use, from a Family Dollar Affected Store in Arkansas.

Excluded from the Class are: (1) Defendants, Defendants' agents, subsidiaries, parents, successors, predecessors, and any entity in which Defendants or its parents have a controlling interest, and those entities' current and former employees, officers, and directors; (2) the Judge to whom this case is assigned and the Judge's immediate family; (3) any person who executes and files a timely request for exclusion from the Class; (4) any persons who have had their claims in this matter finally adjudicated and/or otherwise released; and (5) the legal representatives, successors and assigns of any such excluded person.

31. Plaintiff reserves the right to amend or otherwise alter the class definitions presented to the Court at the appropriate time, or to propose subclasses, in response to facts learned through discovery, legal arguments advanced by Defendants, or otherwise.

32. **Numerosity:** Upon information and belief, the Class is comprised of tens of thousands of members. Thus, the Class is so numerous that joinder of all members is impracticable. Class Members can easily be identified through records of Family Dollar, or by other means.

33. **Commonality and Predominance:** There are several questions of law and fact common to the claims of Plaintiffs and Class Members, which predominate over any individual issues, including:

- a. Whether Defendants' conduct constitutes a breach of implied warranty;
- b. Whether Defendants' conduct constitutes a breach of the Arkansas Deceptive Trade Practices Act;
- c. The appropriate class-wide measure of damages;
- d. Whether Defendants are liable for attorneys' fees and costs.

34. **Typicality:** Plaintiffs' claims are typical of the claims of members of the Class. All claims are based on the same legal and factual issues. Plaintiffs and each of the Class Members purchased Contaminated Products from one or more of Family Dollar's Affected Stores. Defendants' conduct was uniform to Plaintiffs and all Class Members.

35. **Adequacy of Representation:** Plaintiffs will fairly and adequately represent and protect the interests of the members of the Class, and has retained counsel competent and experienced in complex class actions. Plaintiffs have no interests antagonistic to those of any members of the Class, and Defendants have no defenses unique to Plaintiffs. The questions of law and fact common to the proposed Class predominate over any questions affecting only individual members of the Class.

36. **Superiority:** A class action is superior to other available methods for the fair and efficient adjudication of this controversy. The expense and burden of individual litigation would

make it impracticable or impossible for proposed members of the Class to prosecute their claims individually. The trial and the litigation of Plaintiff's claims are manageable.

CAUSES OF ACTION

FIRST CLAIM FOR RELIEF

Breach of Implied Warranty of Merchantability, Ark. Code Ann. §§ 4-2-103, *et seq.*
(On behalf of Plaintiffs and the Class)

37. Plaintiff incorporates by reference all of the above allegations as if set forth herein.

38. Plaintiff and Class Members are "buyers" within the meaning of Arkansas's implied warranty statutes. Ark. Code Ann. § 4-2-103(1).

39. Defendants are "sellers," and the Contaminated Products are a "consumer good." Ark. Code Ann. §§ 4-2-103(1) & (3).

40. Defendants impliedly warranted to Plaintiff and Class Members that the Product was "merchantable." Ark. Code Ann. § 4-2-314.

41. The FDA's inspection findings and subsequent safety communications concerning the West Memphis Distribution Center establish the minimum standards of fitness and show that the Contaminated Products do meet those standards.

42. At the time of sale, the Contaminated Products were not fit for the ordinary purposes for which such goods are sold and were adequately contained, packaged, and labeled. Ark. Code Ann. § 4-2-314(2)(c). The Contaminated Products do not have the quality that a buyer would reasonably expect and were therefore not merchantable.

43. Plaintiffs and Class Members have been injured by their purchase of an unmerchantable product that is worthless and poses a danger to human health.

44. The unmerchantable condition of the Contaminated Products proximately caused Plaintiffs and Class Members' injury.

45. As Family Dollar customers, Plaintiffs and Class members are among those Defendants might reasonably expect to use the Contaminated Products.

46. Any attempt by Defendants to disclaim the implied warranty of merchantability is unenforceable, as the disclaimer failed to mention the implied warranty of merchantability and was not conspicuous as required by law, and was both procedurally and substantively unconscionable, rendering it unenforceable.

47. Plaintiffs and Class Members are entitled to damages and other legal and equitable relief, including, at their election, the purchase price of the product.

SECOND CLAIM FOR RELIEF
Unjust Enrichment
(On behalf of Plaintiffs and the Class)

48. Plaintiffs incorporates by reference all of the above allegations as if set forth herein.

49. Under Arkansas law, unjust enrichment can be found when a party has received something of value to which he was not entitled by operative act, intent, or situation to make the enrichment unjust and compensable.

50. Through their concealment of the true condition of the Contaminated Products, Defendants have been unjustly enriched at the expense of Plaintiffs and Class Members. Because of Defendants' scheme, the Plaintiffs and Class Members have purchased worthless goods which pose a danger to human health. Permitting Defendants to retain overpayments it fraudulently procured would be unjust and inequitable.

51. Plaintiffs and the Class seek restitution of the sum, to be determined at trial, by which Defendants have been unjustly enriched and other damages permitted by law.

THIRD CLAIM FOR RELIEF

**Violation of the Arkansas Deceptive Trade Practices Act, Ark. Code Ann. §§ 4-88-101, *et seq.*
(On behalf of Plaintiffs)**

52. Plaintiffs incorporates by reference all of the above allegations as if set forth herein.

53. Plaintiffs and Defendants are “[p]erson[s]” within the meaning of the Arkansas Deceptive Trade Practices Act (“ADTPA”). Ark. Code Ann. § 4-88-102(5).

54. The Contaminated Products are “[g]oods” under the ADTPA. Ark. Code Ann. § 4-88-102(4).

55. Defendants advertised, offered, or sold goods or services in Arkansas and engaged in trade or commerce directly or indirectly affecting the people of Arkansas. Ark. Code Ann. § 4-88-107.

56. The ADTPA prohibits “[k]nowingly making a false representation as to...whether goods are...of a particular standard, quality, grade, style or model;...[and/or] [e]ngaging in any other unconscionable, false, or deceptive act or practice.” Ark. Code Ann. §§ 4-88-107(a)(1), (10).

57. The ADTPA also prohibits “[a]dvertising...goods...with the intent not to sell them as advertised[.]” Ark. Code Ann. § 4-88-107(a)(3).

58. In connection with the “sale or advertisement of any goods,” it is unlawful under the ADTPA to “act, use, or employ[.]...any deception, fraud, or false pretense” and/or to “conceal[], suppress[], or omi[t]...any material fact with intent that others rely upon the concealment, suppression, or omission...[.]” Ark. Code Ann. §§ 4-88-108(a)(1)-(2).

59. Defendants’ conduct is in violation of the ADTPA constituting deceptive and unconscionable trade practice because Defendants knowingly and intentionally made representations to Plaintiffs that amounted to deception, fraud, false pretenses, false promise, misrepresentation, unfair practice, or the concealment, suppression, or omission of the material

fact that the Contaminated Products were stored in such unsanitary conditions that they are unfit for human consumption or use, are worthless, and should be discarded.

60. Defendants were well aware of the conditions of the West Memphis Distribution Center prior to the February 18, 2022, recall, and were put on notice by at least September 2021 of those conditions.

61. Defendants failed to put policies and procedures in place to maintain the conditions required for food storage.

62. In the course of Defendants' business, it misrepresented, failed to disclose, and actively concealed the condition of the Contaminated Products with the intent that consumers rely on that concealment in deciding whether to purchase the Contaminated Products.

63. By intentionally concealing the conditions of the West Memphis Distribution Center while advertising the Contaminated Products as safe, Defendants engaged in deceptive acts or practices in violation of the ADTPA.

64. Defendants' deceptive acts or practices were materially misleading. Defendants' conduct was likely to and did deceive reasonable consumers, including Plaintiffs, about the true condition of the Contaminated Products.

65. Plaintiffs was unaware of, and lacked a reasonable means of discovering, the material facts that Defendants suppressed.

66. Plaintiffs suffered "actual financial loss." Ark. Code Ann. § 4-88-113(1).

67. Defendants' unlawful and misleading conduct concerns widely purchased consumer goods and affects the public interest. Defendants' conduct includes unlawful and misleading acts or practices that have and had the capacity to deceive consumers and are harmful to the public at large.

68. As a result of Defendants' ADTPA violations, Plaintiffs is entitled to recover actual damages, as well as reasonable attorneys' fees.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs, individually and on behalf of the other members of the Classes proposed in this Class Action Complaint, pray for judgment and relief against Defendants as follows:

- a) For an order declaring: (i) this is a class action pursuant to Rule 23 of the Arkansas Rules of Civil Procedure on behalf of the proposed Class described herein; and (ii) appointing Plaintiffs to serve as representatives for the Class and Plaintiffs's counsel to serve as Class Counsel;
- b) For an order awarding restitution of the monies Defendants wrongfully acquired by its illegal and deceptive conduct;
- c) For an order requiring disgorgement of the monies Defendants wrongfully acquired by its illegal and deceptive conduct;
- d) For compensatory and punitive damages, including actual and statutory damages, arising from Defendants' wrongful conduct and illegal conduct;
- e) For an award of reasonable attorneys' fees and costs and expenses incurred in the course of prosecuting this action; and
- f) For such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiffs demands a trial by jury of all claims in this Class Action Complaint so triable.

DATED: February 22, 2022

Respectfully submitted,
STREETT LAW FIRM, P.A

By: /s/James A. Streett

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AND

By: /s/ J.Gerard Stranch, IV

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Family Dollar Stores Issues Voluntary Recall of Certain FDA-Regulated Products in Six States Including Drugs, Devices, Cosmetics, Foods

 [businesswire.com/news/home/20220218005563/en/Family-Dollar-Stores-Issues-Voluntary-Recall-of-Certain-FDA-Regulated-Products-in-Six-States-Including-Drugs-Devices-Cosmetics-Foods](https://www.businesswire.com/news/home/20220218005563/en/Family-Dollar-Stores-Issues-Voluntary-Recall-of-Certain-FDA-Regulated-Products-in-Six-States-Including-Drugs-Devices-Cosmetics-Foods)

February 19, 2022



CHESAPEAKE, Va.--(BUSINESS WIRE)--Family Dollar, Inc. is initiating a voluntary retail level product recall of certain products regulated by the U.S. Food and Drug Administration (FDA) that were stored and shipped to 404 stores from Family Dollar Distribution Center 202 in West Memphis, Arkansas from January 1, 2021 through the present due to the presence of rodents and rodent activity at Family Dollar Distribution Center 202.

There are numerous hazards associated with rodents including the potential presence of *Salmonella*. Use or consumption of affected products may present risk of illness due to the potential presence of *Salmonella*, an organism which can cause serious and sometimes fatal infections in infants, young children, frail or elderly people pregnant persons, persons with pre-existent pathology (e.g., patients with cancer undergoing chemotherapy treatments, organ transplant recipient, etc.) and others with weakened immune systems. Healthy persons infected with *Salmonella* often experience fever, diarrhea (which may be bloody), nausea, vomiting and abdominal pain. In rare circumstances, infection with *Salmonella* can result in the organism getting into the bloodstream and producing more severe illnesses such as arterial infections (i.e., infected aneurysms), endocarditis and arthritis.

To date, Family Dollar is not aware of any consumer complaints or reports of illness related to this recall.

Products covered by this retail level recall include all: (i) drugs; (ii) medical devices; (iii) cosmetics; (iv) dietary supplements; and (v) human and animal (pet) food products. The recall does not apply to products shipped directly to the stores by the distributor or manufacturer, such as all frozen and refrigerated items. The 404 stores to which this recall applies are listed on the attached schedule. The recall does not apply to other store locations.

Family Dollar is notifying its affected stores by letter asking them to check their stock immediately and to quarantine and discontinue the sale of any affected product. Customers that may have bought affected product may return such product to the Family Dollar store where they were purchased without receipt.

Customers with questions regarding this recall may contact Family Dollar Customer Service at 844-636-7687 between 9am and 5pm EST. Customers should contact their physician or health care provider if they have experienced any problems that may be related to using these products. Customers with concerns about their pets who have eaten the recalled animal food products should contact their veterinarian.

Adverse reactions or quality problems experienced with the use of these products may be reported to the FDA as follows:

- Complete and submit the report online: www.fda.gov/medwatch/report.htm
- **Regular Mail or Fax:** Download form www.fda.gov/MedWatch/getforms.htm or call 1-800-332-1088 to request a reporting form, then complete and return to the address on the pre-addressed form or submit by fax to 1-800-FDA-0178.
- <https://www.fda.gov/safety/report-problem-fda>

This voluntary retail level recall is being conducted with the knowledge of the U.S. Food and Drug Administration.

About Family Dollar

For more than 60 years, Family Dollar has been providing value and convenience to customers in easy-to-shop neighborhood locations. Family Dollar's mix of name brands, and quality, private brand merchandise appeals to shoppers in approximately 8,000 stores in rural and urban settings across 48 states. Helping families save on the items they need with everyday low prices creates a strong bond with customers who refer to their neighborhood store as "my Family Dollar." Family Dollar is a wholly-owned subsidiary of Dollar Tree, Inc. headquartered in Chesapeake, Virginia. For more information, please visit FamilyDollar.com.



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Schedule 1

Alabama Stores				
Store Num.	Street Address	City	State	Zip
567	35 MEMORIAL PKY E	ALICEVILLE	AL	35442-2155
12825	15704 AL HIGHWAY 216	BROOKWOOD	AL	35444
12505	206 GREENSBORO STREET	EUTAW	AL	35462
868	303 S. MAIN ST.	LINDEN	AL	36748-1725
9012	1307 NORTH WASHINGTON STREET	LIVINGSTON	AL	35470
8919	P O BOX 308	MOUNDEVILLE	AL	35474
12506	5705 US HIGHWAY 278	SULLIGENT	AL	35586
639	524 14TH ST	TUSCALOOSA	AL	35401-3434
3812	1507 CULVER RD	TUSCALOOSA	AL	35401-2632
10460	2515 MARTIN LUTHER KING JR BLV	TUSCALOOSA	AL	35401
11726	3851 GREENSBORO AVENUE	TUSCALOOSA	AL	35405-2846
12679	1525 SKYLAND BLVD EAST	TUSCALOOSA	AL	35405-4231
2714	9598 HIGHWAY 18	VERNON	AL	35592-1527
9013	700 4TH AVENUE	YORK	AL	36925
Arkansas Stores				
Store Num.	Street Address	City	State	Zip
11135	1550 PINE STREET	ARKADELPHIA	AR	71923
8376	603 NORTH CHURCH ST.	ATKINS	AR	72823
985	1275 E MAIN ST	BATESVILLE	AR	72501-3018
4378	2001 W MAIN ST	BLYTHEVILLE	AR	72315-3033
4239	1421 PINECREST STREET	BRINKLEY	AR	72021-0000
11116	1302 S PINE STREET	CABOT	AR	72023-3812
1197	216 CALIFORNIA AVENUE	CAMDEN	AR	71701
4154	300 MADISON ST	CLARENDON	AR	72029-2718
6613	P.O. BOX 265	CLARKSVILLE	AR	72830
1068	254 OAK ST	CONWAY	AR	72032
2899	308 C PINE STREET	CROSSETT	AR	71635-2910
9296	301 E 8TH STREET	DANVILLE	AR	72833
10410	205 E SPEEDWAY STREET	DERMOTT	AR	71638
12661	1602 MAIN STREET	DES ARC	AR	72040-3116
601	300 S. WHITEHEAD DRIVE	DEWITT	AR	72042
11229	439 E CHOCTAW STREET	DUMAS	AR	71639-2319
2994	17668 US HIGHWAY 64	EARLE	AR	72331
1467	424 N WEST AVE	EL DORADO	AR	71730-5938
4396	1005 E FORDYCE ST	ENGLAND	AR	72046-1417



3026	2963 S HWY 65	EUDORA	AR	71640
1048	1007 W 4TH ST	FORDYCE	AR	71742-2217
4112	228 W BROADWAY ST	FORREST CITY	AR	72335
3278	802 E MAIN ST STE 1	GREEN FOREST	AR	72638
10609	506 E. MAIN ST.	GURDON	AR	71743-1244
13122	700 N MAIN STREET	HAMBURG	AR	71646-2718
11148	214 S LEE STREET	HAMPTON	AR	71744
4251	608 N ILLINOIS ST	HARRISBURG	AR	72432-1248
1526	640 MALVERN AVE	HOT SPRINGS	AR	71901-5432
3261	3339 CENTRAL AVE	HOT SPRINGS	AR	71913-6279
6016	899 PARK AVE	HOT SPRINGS	AR	71901-3004
8473	3242 ALBERT PIKE RD	HOT SPRINGS	AR	71913
5598	1700 S HIGHWAY 161	JACKSONVILLE	AR	72076-5509
3527	106 S GEE ST	JONESBORO	AR	72403-2519
12892	1218 N HIGHWAY65	LAKE VILLAGE	AR	71653-7563
12823	325 W BROAD STREET	LEPANTO	AR	72354-2203
708	801 E. ROOSEVELT ROAD	LITTLE ROCK	AR	72206-2410
1314	4514 W 12TH ST	LITTLE ROCK	AR	72204-1924
1478	3500 BASELINE ROAD	LITTLE ROCK	AR	72209
2769	8824 GEYER SPRINGS RD	LITTLE ROCK	AR	72209-4701
3632	3901 S UNIVERSITY AVE	LITTLE ROCK	AR	72204-7832
3762	20290 ARCH ST	LITTLE ROCK	AR	72206-9217
4825	1711 MAIN ST	LITTLE ROCK	AR	72206-1471
5771	8510 COLONEL GLENN RD	LITTLE ROCK	AR	72204-8229
7191	5200 WEST 65TH ST	LITTLE ROCK	AR	72209-3818
8936	10422 CHICOT ROAD	LITTLE ROCK	AR	72209
11390	2408 DR MARTIN LUTHER KING JR	LITTLE ROCK	AR	77206-2079
9371	404 E PAGE AVENUE	MALVERN	AR	72104
1037	286 W CHESTNUT ST	MARIANNA	AR	72360-2132
2295	138 BLOCK ST	MARION	AR	72364-1956
10820	P.O. BOX 65	MARVELL	AR	72366
12712	652 HIGHWAY 365	MAYFLOWER	AR	72106-9630
602	606 HOLLY STREET	MCGEHEE	AR	71654
12754	609 E MAIN STREET	MELBOURNE	AR	72556-8031
11091	620 W GAINES STREET	MONTICELLO	AR	71655
12749	1313 E BROADWAY	MORRILTON	AR	72110
741	2633 PIKE AVE	N LITTLE ROCK	AR	72114-1926
1921	4149 E BROADWAY ST	N LITTLE ROCK	AR	72117-4120



6314	4204 CAMP ROBINSON RD	N LITTLE ROCK	AR	72118-4610
10170	2121 HIGHWAY 161	N LITTLE ROCK	AR	72117-3707
10531	715 E BROADWAY STREET	N LITTLE ROCK	AR	72114-5764
5472	4143 JOHN F. KENNEDY BLVD	NORTH LITTLE ROCK	AR	72116-8264
12112	5613 MACARTHUR DRIVE	NORTH LITTLE ROCK	AR	72118
12842	1051 W KEISER	OSCEOLA	AR	72370-2914
1109	300 W KINGS HIGHWAY	PARAGOULD	AR	72450-4229
2436	416 S FOURCHE AVE	PERRYVILLE	AR	72126-8005
1105	2801 S OLIVE ST	PINE BLUFF	AR	71603-5439
3782	5316 DOLLARWAY RD	PINE BLUFF	AR	71602-4013
4955	1113 S BLAKE ST	PINE BLUFF	AR	71603-2315
5604	3100 W 28TH AVE	PINE BLUFF	AR	71603-4805
8153	1607 E HARDING AVE.	PINE BLUFF	AR	71601-6823
11882	1169 W 16TH AVE	PINE BLUFF	AR	71603
4153	2104 HIGHWAY 62 W	POCAHONTAS	AR	72455-3640
4009	1200 S KNOXVILLE AVE	RUSSELLVILLE	AR	72802-6401
2686	2223 W BEEBE CAPPS EXPY	SEARCY	AR	72143-5018
12562	601 S LINCOLN	STAR CITY	AR	71667
8952	1823 S. MAIN STREET	STUTTGART	AR	72160-6012
2096	443 HIGHWAY 463 S	TRUMANN	AR	72472
12780	10 EAGLE STREET	VILONIA	AR	72173
3956	500 SW FRONT ST	WALNUT RIDGE	AR	72476-2637
1256	317 S MARTIN ST	WARREN	AR	71671-2817
1294	233 N SEBASTIAN ST	WEST HELENA	AR	72390-2447
785	2113 E BROADWAY ST	WEST MEMPHIS	AR	72301-3454
3180	209 SHOPPINGWAY BLVD STE B	WEST MEMPHIS	AR	72301-1733
11802	420 S AVALON STREET	WEST MEMPHIS	AR	72301
798	P O BOX 591	WYNNE	AR	72396-0591
Louisiana Stores				
Store Num.	Street Address	City	State	Zip
906	232 BOLTON AVE	ALEXANDRIA	LA	71301-7126
6568	2501 3RD ST	ALEXANDRIA	LA	71302-6102
8397	1801 HAZEL ST	ARCADIA	LA	71001-4131
10819	1022 COTEAU RODAIRE HIGHWAY	ARNAUDVILLE	LA	70512
749	810 MAIN ST	BAKER	LA	70714-3442
917	542 N WASHINGTON ST	BASTROP	LA	71220-3040
6150	1714 E MADISON AVE	BASTROP	LA	71220-4032
11090	8027 SCENIC HIGHWAY	BATON ROUGE	LA	70807-4926



11753	6910 MICKENS ROAD	BATON ROUGE	LA	70811-5937
10832	60 WEST 4TH STREET	BERNICE	LA	71222
3542	904 REES ST STE B	BREAUX BRIDGE	LA	70517-4514
4432	P.O. BOX 308	BREAUX BRIDGE	LA	70517
11871	3047 GRAND POINT HIGHWAY	BREAUX BRIDGE	LA	70517
12005	1802 ANSE BROUSSARD HWY	BREAUX BRIDGE	LA	70517
707	816 NW MAIN ST	BUNKIE	LA	71322-1644
7631	161 HIGHWAY 80 EAST	CALHOUN	LA	71225-9147
877	631 VETERANS MEMORIAL DRIVE	CARENCRO	LA	70520-3620
9337	P.O. BOX 537	CARENCRO	LA	70520
11174	2405 HWY 93	CARENCRO	LA	70520
12829	1045 HIGHWAY 107	CENTER POINT	LA	71323
8256	1234 HWY 4	CHATHAM	LA	71226
2562	336 S. MAIN STREET	CHURCH POINT	LA	70525
5417	9203 HWY 67	CLINTON	LA	70722
1852	7741 HWY 165	COLUMBIA	LA	71418-3323
5365	409 CHOUIPIQUE LN	COTTONPORT	LA	71327-3737
8495	807 BROADWAY DR.	DELHI	LA	71232
12463	12905 LA 28 EAST	DEVILLE	LA	71328
5281	505 S MAIN ST	FARMERVILLE	LA	71241-3215
664	504 E WALLACE RD	FERRIDAY	LA	71334-3223
8482	6194 HIGHWAY 10	GREENSBURG	LA	70441
12194	707 HWY 8	HARRISONBURG	LA	71340
2596	3000 HIGHWAY 10	JACKSON	LA	70748-1409
8568	448 OLD WINNFIELD RD	JONESBORO	LA	71251-3855
650	1904 4TH STREET	JONESVILLE	LA	71343
5732	512 AVENUE G	KENTWOOD	LA	70444-2726
1126	2009 W UNIVERSITY AVE	LAFAYETTE	LA	70506-2576
1714	107 CARMEL AVE	LAFAYETTE	LA	70501-5001
2766	2228 AMBASSADOR CAFFERY PKY	LAFAYETTE	LA	70506-3705
4746	1100 W WILLOW ST	LAFAYETTE	LA	70501-1779
7526	3550 W PINHOOK RD	LAFAYETTE	LA	70508-3607
10333	4301 MOSS ROAD	LAFAYETTE	LA	70507
11563	501 E PINHOOK ROAD	LAFAYETTE	LA	70501
11630	3841 W CONGRESS STREET	LAFAYETTE	LA	70506
11808	1944 MOSS STREET	LAFAYETTE	LA	70501-2118
649	300 SPARROW ST	LAKE PROVIDENCE	LA	71254-3034
11404	10251 PREJEAN HIGHWAY	LAWTELL	LA	70550



4096	8389 HWY 190 SE	LIVONIA	LA	70755
5221	P O BOX 6	MANSURA	LA	71350-0006
941	355 W TUNICA DR	MARKSVILLE	LA	71351-2605
834	1421 WINNSBORO RD	MONROE	LA	71202-4523
1262	3038 DESIARD ST	MONROE	LA	71201-7210
3003	7916 DESIARD ST	MONROE	LA	71203-4936
4788	3390 STERLINGTON RD	MONROE	LA	71203-2522
7850	1420 HOSPITAL ROAD	NEW ROADS	LA	70760
11251	401 ELM STREET	NEW ROADS	LA	70760-3001
12784	1106 VERONA STREET	NEWELLTON	LA	71357
8736	310 WEST MAIN STREET	OAK GROVE	LA	71263
813	209 NATCHEZ BLVD	OPELOUSAS	LA	70570-6524
3133	933 CRESSWELL LN	OPELOUSAS	LA	70570-5819
5033	718 S UNION ST	OPELOUSAS	LA	70570-6028
5892	1322 W LANDRY ST	OPELOUSAS	LA	70570-3455
11788	8311 HIGHWAY 71 N	PINEVILLE	LA	71360-2752
12405	8016 RIDGE STREET	POLLOCK	LA	71467
11324	12902 HIGHWAY 190 W	PORT ALLEN	LA	70767
4831	17491 HIGHWAY 190	PORT BARRE	LA	70577-5126
3936	1910 JULIA STREET	RAYVILLE	LA	71269-5516
5006	3296 HWY 165 SOUTH	RICHWOOD	LA	71202
11596	2610 RICHWOOD ROAD 2	RICHWOOD	LA	71202
8007	612 S MONROE ST	RUSTON	LA	71270
11435	601 E GEORGIA AVENUE	RUSTON	LA	71270-3930
5581	5620 CAMERON ST	SCOTT	LA	70583-5200
11622	1061 RENAUD DRIVE	SCOTT	LA	70583
12171	9447 HIGHWAY 80	SIMSBORO	LA	71275-3002
12863	1101 PLANK RD	ST. JOSEPH	LA	71366
9032	10008 HIGHWAY 165 N	STERLINGTON	LA	71280
5020	122 OAK TREE PARK DR	SUNSET	LA	70584
717	300 N CHESTNUT ST	TALLULAH	LA	71282-3712
670	1919 CARTER ST.	VIDALIA	LA	71373
4433	710 W MAIN ST	VILLE PLATTE	LA	70586-4326
5470	553 VETERANS BLVD	WASHINGTON	LA	70589
835	117 SMITH ST	WEST MONROE	LA	71292-6046
5335	1202 CYPRESS ST	WEST MONROE	LA	71291-2840
8935	3002 CYPRESS STREET	WEST MONROE	LA	71291
11335	5075 CYPRESS STREET	WEST MONROE	LA	71291



11721	5872 JONESBORO ROAD	WEST MONROE	LA	71292
1165	815 W COURT ST	WINNFELD	LA	71483-2637
9066	3636 FRONT STREET	WINNSBORO	LA	71295-2224
9361	139 MAPLE STREET	WISNER	LA	71378
8795	P.O. BOX 1346	YOUNGSVILLE	LA	70592
7706	4950 HWY 19	ZACHARY	LA	70791
Missouri Stores				
Store Num.	Street Address	City	State	Zip
9411	601 S MAIN STREET	CHARLESTON	MO	63834
2388	312 W STODDARD ST	DEXTER	MO	63841-1536
12555	125 PRAIRIE DRIVE	EAST PRAIRIE	MO	63845
3524	401 FIRST ST	KENNETT	MO	63857
2575	1031 E MALONE AVE	SIKESTON	MO	63801
9188	209 W MALONE AVENUE	SIKESTON	MO	63801
12816	1409 MAIN STREET	VAN BUREN	MO	63965
1194	1308 PORTER WAGONER BLVD	WEST PLAINS	MO	65775
Mississippi Stores				
Store Num.	Street Address	City	State	Zip
4127	103 HIGHWAY 45 N	ABERDEEN	MS	39730-2305
12611	222 MABUS STREET	ACKERMAN	MS	39735
2324	209 N 2ND AVE	BALDWYN	MS	38824-1810
10384	4168 HIGHWAY 42	BASSFIELD	MS	39421
3246	116 HIGHWAY 51 N	BATESVILLE	MS	38606-2347
2985	2760D HIGHWAY 15	BAY SPRINGS	MS	39422
5124	P.O. BOX 1143	BELMONT	MS	38827-1143
1104	620 E FIRST ST	BELZONI	MS	39038-3406
2180	304 E GOVERNMENT ST	BRANDON	MS	39042-3262
10767	600 E MONTICELLO ST.	BROOKHAVEN	MS	39601
3506	1074 E PEACE ST	CANTON	MS	39046-4026
10265	1131 W PEACE STREET	CANTON	MS	39046
11902	3376 N. LIBERTY STREET	CANTON	MS	39046-3717
642	PO BOX 1029	CENTREVILLE	MS	39631-1029
3303	310 W MAIN ST	CHARLESTON	MS	38921-2231
849	620 S STATE ST	CLARKSDALE	MS	38614-6322
5493	1032 N STATE ST	CLARKSDALE	MS	38614-6524
3508	406 S DAVIS AVENUE	CLEVELAND	MS	38732-3412
3514	222 CLINTON BLVD	CLINTON	MS	39056-5126
7819	816 MAIN STREET	COLLINS	MS	39428



674	1412 MAIN ST	COLUMBUS	MS	39701-4970
7451	202 ALABAMA ST	COLUMBUS	MS	39702
12672	60 MIKE PARRA RD	COLUMBUS	MS	39705-1292
2941	P. O. BOX 542	CRYSTAL SPRINGS	MS	39059-0267
12882	14916 HIGHWAY 16 W	DE KALB	MS	39328
12695	15458 HIGHWAY 15	DECATUR	MS	39327
545	144 W PARK AVE	DREW	MS	38737-0443
1152	369 E MADISON ST	DURANT	MS	39063-3713
8842	1960 VETERAN'S MEMORIAL BLVD S	EUPORA	MS	39744
12656	101 MANSKER DRIVE	FLORA	MS	39071
12548	1409 S ADAMS STREET	FULTON	MS	38843
8769	437 N CAPTAIN GLOSTER DR	GLOSTER	MS	39638
12291	9563 MAIN ST.	GOODMAN	MS	39079
547	110 N HARVEY ST	GREENVILLE	MS	38701-3713
4820	2101 HIGHWAY 82 E	GREENVILLE	MS	38703-6029
8658	1443 MLK BLVD S.	GREENVILLE	MS	38703
12334	1325 HWY 82 W	GREENVILLE	MS	38701
2783	700 HIGHWAY 7 N	GREENWOOD	MS	38930
11610	320 HIGHWAY 82 W	GREENWOOD	MS	38930
5068	1815 COMMERCE ST	GRENADA	MS	38901-5106
10222	100 N DR. MLK JR. BLVD.	GRENADA	MS	38901
8553	20014 HWY 53	GULFPORT	MS	39503
12872	40055 HAMILTON RD	HAMILTON	MS	39746
1119	215 BROADWAY DR	HATTIESBURG	MS	39401-5083
4302	130 TRADE CENTER LN	HAZELHURST	MS	39083-2319
2801	1002 EAST AVE N	HOLLANDALE	MS	38748-3222
632	183 N. MEMPHIS STREET	HOLLY SPRINGS	MS	38635-2257
9228	3230 GOODMAN ROAD W	HORN LAKE	MS	38637
3724	903C HWY 82 E	INDIANOLA	MS	38751-2325
559	3204 MEDGAR EVERS BOULEVARD	JACKSON	MS	39213-6842
1695	3140 W NORTHSIDE DRIVE	JACKSON	MS	39213
3177	4445 N STATE ST	JACKSON	MS	39206-5306
3921	2566 ROBINSON ST STE B	JACKSON	MS	39209-7029
3993	516 NAKOMA DR	JACKSON	MS	39206-3332
5171	3366 TERRY RD	JACKSON	MS	39212-4953
5213	320 W WOODROW WILSON AVE	JACKSON	MS	39213-7649
5535	2019A RAYMOND RD	JACKSON	MS	39204-4131
5870	3111 W CAPITAL ST	JACKSON	MS	39209-4204



6731	311 BRIARWOOD DR	JACKSON	MS	39206-3002
6791	4747 CLINTON BLVD	JACKSON	MS	39209-2405
6938	3707 S SIWELL RD	JACKSON	MS	39212-4396
10443	2820 TERRY ROAD	JACKSON	MS	39212
11570	1201 UNIVERSITY BOULEVARD	JACKSON	MS	39204-3055
11840	4610 TERRY ROAD	JACKSON	MS	39212
12294	5060 PARKWAY DRIVE	JACKSON	MS	39211
2800	329 HIGHWAY 12 EAST	KOSCIUSKO	MS	39090-3420
546	604 N BROAD ST	LELAND	MS	38756-2622
658	327 DEPOT ST	LEXINGTON	MS	39095-3606
8084	332 E MAIN ST	LIBERTY	MS	39645
10530	401 SOUTH CHURCH AVENUE	LOUISVILLE	MS	39339-2921
4103	601 S JEFFERSON ST	MACON	MS	39341-3009
8040	115 N. CLARK AVE.	MAGNOLIA	MS	39652-2821
12554	67 WATSON DRIVE	MANTACHIE	MS	38855
10507	5321 DALE DRIVE	MARION	MS	39342
4108	713 MARTIN LUTHER KING DR.	MARKS	MS	38646
778	1209 DELAWARE AVE	MC COMB	MS	39648-3763
5460	1200 LASALLE ST	MCCOMB	MS	39648
8358	P.O. BOX 709	MEADVILLE	MS	39653-0709
10905	1736 SIMPSON HIGHWAY 149	MENDENHALL	MS	39114-3423
2182	2815 8TH STREET	MERIDIAN	MS	39301-4845
7601	713 E BROAD ST	MONTICELLO	MS	39654-7707
6603	395 JOHN R JUNKIN DR	NATCHEZ	MS	39120-3823
11577	1196 N MARTIN LUTHER KING JR S	NATCHEZ	MS	39120-3162
12723	188 NORTHSIDE DRIVE	NEWTON	MS	39345
12707	511 W MONROE AVENUE	OKOLONA	MS	38860
2727	3123 HWY 80 E	PEARL	MS	39208-3503
10158	621 SOUTH PEARSON ROAD	PEARL	MS	39208
10844	800 E MAIN STREET	PHILADELPHIA	MS	39350
2450	P O BOX 41	PORT GIBSON	MS	39150-0041
3354	PO BOX 1556	PRENTISS	MS	39474
566	548 S ARCHUSA AVE	QUITMAN	MS	39355-2416
12170	202 WHITE OAK	RALEIGH	MS	39153
12887	825 E MAIN STREET	RAYMOND	MS	39154
10157	1606 E COUNTY LINE ROAD	RIDGELAND	MS	39157-1906
12328	398 HWY 51	RIDGELAND	MS	39157
7922	1115 CASINO CENTER DR.	ROBINSONVILLE	MS	38664



12474	20503 HIGHWAY 61	ROLLING FORK	MS	39159
4319	P O BOX 218	RULEVILLE	MS	38771-0218
12579	23 HWY 590 W	SEMINARY	MS	39479
12943	13824 US-98	SMITHDALE	MS	39664
3443	8650 HIGHWAY 51 N	SOUTHAVEN	MS	38671-2924
10236	980 CHURCH RD. W.	SOUTHAVEN	MS	38671-9611
565	213 N JACKSON STREET	STARKVILLE	MS	39759-2501
10203	1440 US HWY. 61 N	TUNICA	MS	38676
523	701 W MAIN ST	TUPELO	MS	38804-3707
6109	900 BEULAH AVE	TYLERTOWN	MS	39667-2174
10393	803 E JACKSON ROAD	UNION	MS	39365
12766	34195 HIGHWAY 35	VAIDEN	MS	39176
2483	2080 S FRONTAGE ROAD	VICKSBURG	MS	39180
6160	1305 MISSION 66	VICKSBURG	MS	39180-3365
11162	135 HIGHWAY 27	VICKSBURG	MS	39180
12444	1800 HIGHWAY 61, NORTH	VICKSBURG	MS	39183
12445	5100 HWY 61 SOUTH	VICKSBURG	MS	39180
12720	409 DUNCAN STREET	WATER VALLEY	MS	38965
11941	2071 HIGHWAY 51	WESSON	MS	39191
12666	106 S APPLGATE STREET	WINONA	MS	38967
8499	184 MAIN ST.	WOODVILLE	MS	39669
2799	301 BROADWAY STREET	YAZOO	MS	39194
5957	760 E 15TH ST	YAZOO CITY	MS	39194-2706
Tennessee Stores				
Store Num.	Street Address	City	State	Zip
10798	306 E. MAIN STREET	ADAMSVILLE	TN	38310-2318
4418	2686 KIRBY WHITTEN RD	BARTLETT	TN	38133
8323	1745 SYCAMORE VIEW RD.	BARTLETT	TN	38134-6517
2850	605 W MARKET STREET	BOLIVAR	TN	38008-2240
10605	605 E MAIN STREET	BROWNSVILLE	TN	38012-2627
10252	1683 APPLING RD.	CORDOVA	TN	38016-4907
10467	9109 US 64	CORDOVA	TN	38016
2748	605 HWY 51 N	COVINGTON	TN	38019
3283	1935 ST JOHN AVE #C	DYERSBURG	TN	38024-2132
12020	228 HIGHWAY 57 W	GRAND JUNCTION	TN	38039-4268
4235	121 WHITLEY AVE	HENDERSON	TN	38340-2221
1113	903 HOLLYWOOD DR	JACKSON	TN	38301-4764
3995	1011 OLD HICKORY BLVD	JACKSON	TN	38305-2483



6127	224 N ROYAL ST	JACKSON	TN	38301-6341
9380	1000 WHITEHALL STREET	JACKSON	TN	38301
10627	1301 N HIGHLAND AVENUE	JACKSON	TN	38301-4018
624	117 W. CHURCH STREET	LEXINGTON	TN	38351
12886	211 THREE OAKS DRIVE	MEDINA	TN	38355-1501
699	3223 WINCHESTER RD	MEMPHIS	TN	38118-4827
723	2168 FRAYSER BLVD	MEMPHIS	TN	38127-5755
724	3975 JACKSON AVE	MEMPHIS	TN	38128-6670
751	3190 N THOMAS #3192	MEMPHIS	TN	38127-6001
759	4100 S PLAZA DR	MEMPHIS	TN	38116-6335
820	142 N AVALON ST	MEMPHIS	TN	38104-2408
876	2920 LAMAR AVE	MEMPHIS	TN	38114
1170	4724 MILLBRANCH RD	MEMPHIS	TN	38116-8031
1555	3400 SUMMER AVENUE	MEMPHIS	TN	38122
1568	1107 S BELLEVUE BLVD	MEMPHIS	TN	38106-2344
2723	2500 ELVIS PRESSLEY BLVD	MEMPHIS	TN	38106-8333
3370	3682 NORTH WATKINS ST	MEMPHIS	TN	38127-4361
3398	4689 KNIGHT ARNOLD RD	MEMPHIS	TN	38118-3234
3412	3242 JACKSON AVE	MEMPHIS	TN	38122-1009
3537	4216 SUMMER AVE	MEMPHIS	TN	38122-4044
4181	2570 FRAYSER BLVD	MEMPHIS	TN	38127-5829
5362	2912 COLEMAN RD	MEMPHIS	TN	38128
5671	4330 WINCHESTER RD	MEMPHIS	TN	38118
5803	3315 E SHELBY DR	MEMPHIS	TN	38118-7256
5844	4727 NEELY RD	MEMPHIS	TN	38109-8550
5898	3566 S MENDENHALL RD	MEMPHIS	TN	38115-4512
5960	6636 E SHELBY DR	MEMPHIS	TN	38141-8439
5984	5355 ELVIS PRESLEY BLVD	MEMPHIS	TN	38116-8235
6010	3141 S MENDENHALL RD	MEMPHIS	TN	38115-2827
6097	3255 HICKORY HILL RD	MEMPHIS	TN	38115-3135
6105	3338 AUSTIN PEAY HWY	MEMPHIS	TN	38128-3802
6439	2743 N WATKINS ST	MEMPHIS	TN	38127-8564
6465	2981 PARK AVE	MEMPHIS	TN	38114-2731
6487	3515 RIDGEMONT AVE	MEMPHIS	TN	38128-1830
6708	3435 MILLBRANCH RD	MEMPHIS	TN	38116-3625
6818	3500 RAMILL ROAD	MEMPHIS	TN	38128
6892	6415 E RAINES RD	MEMPHIS	TN	38115-6540
7230	2374 SUMMER AVE	MEMPHIS	TN	38112-2518



8027	287 N. CLEVELAND ST.	MEMPHIS	TN	38104-7145
8417	2715 S PERKINS ROAD	MEMPHIS	TN	38118-2430
8516	1636 GETWELL RD	MEMPHIS	TN	38111-7120
8558	180 EAST E H CRUMP BLVD	MEMPHIS	TN	38106-1714
8579	831 THOMAS ST	MEMPHIS	TN	38107-2543
8580	3390 S US HIGHWAY 61	MEMPHIS	TN	38109
8597	2760 LAMAR AVE.	MEMPHIS	TN	38114-4316
8610	656 S HIGHLAND STREET	MEMPHIS	TN	38111-4356
8681	1870 N GERMANTOWN PKWY.	MEMPHIS	TN	38016-2815
8690	1427 N HOLLYWOOD ST.	MEMPHIS	TN	38108-1533
8691	6550 MT. MORIAH RD	MEMPHIS	TN	38115
8694	2644 JAMES RD	MEMPHIS	TN	38127-8811
8735	4082 US HIGHWAY 61 SUITE 101	MEMPHIS	TN	38109
8814	4280 MACON RD	MEMPHIS	TN	38122-4811
8865	3544 COVINGTON PIKE	MEMPHIS	TN	38128-3926
8866	1539 WHITTEN ROAD	MEMPHIS	TN	38134
8953	4202 HACKS CROSS RD	MEMPHIS	TN	38125
8979	2711 GETWELL RD	MEMPHIS	TN	38118
8980	2970 POPLAR AVENUE	MEMPHIS	TN	38111
8992	4618 QUINCE RD	MEMPHIS	TN	38117-6547
9011	2360 AIRWAYS BLVD.	MEMPHIS	TN	38114-6009
9049	1688 JACKSON AVENUE	MEMPHIS	TN	38107
9229	3403 ELVIS PRESLEY BLVD	MEMPHIS	TN	38116-3259
9341	5245 RIVERDALE ROAD	MEMPHIS	TN	38141-8551
11549	4194 HICKORY HILL ROAD	MEMPHIS	TN	38141-6814
11664	910 JACKSON AVENUE	MEMPHIS	TN	38107-4134
11811	6222 WINCHESTER ROAD	MEMPHIS	TN	38115-4175
11953	1450 S TREZEVANT STREET	MEMPHIS	TN	38114-6607
12821	716 S MAIN ST	MIDDLETON	TN	38052
854	4839 NAVY RD	MILLINGTON	TN	38053-2030
6044	1345 MUNFORD AVENUE	MUNFORD	TN	38058-6749
12531	503 TENNESSEE AVENUE N	PARSONS	TN	38363
4175	101 LAKE ST	RIDGELY	TN	38080-1314
582	180 SOUTH WASHINGTON STREET	RIPLEY	TN	38063-1514
779	2007 WAYNE RD	SAVANNAH	TN	38372-2235
4539	17575 US HWY 64	SOMERVILLE	TN	38068
633	128 DAVY CROCKETT MALL	TRENTON	TN	38382-2934


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FDA NEWS RELEASE

FDA Alerts the Public to Potentially Contaminated Products from Family Dollar Stores in Six States

For Immediate Release:

February 18, 2022

Today, the U.S. Food and Drug Administration is alerting the public that several categories of FDA-regulated products purchased from Jan. 1, 2021, through the present from Family Dollar stores in Alabama, Arkansas, Louisiana, Mississippi, Missouri and Tennessee may be unsafe for consumers to use. The impacted products originated from the company's distribution facility in West Memphis, Arkansas, where an FDA inspection found insanitary conditions, including a rodent infestation, that could cause many of the products to become contaminated. The FDA is working with the company to initiate a voluntary recall (<https://www.businesswire.com/news/home/20220218005563/en/Family-Dollar-Stores-Issues-Voluntary-Recall-of-Certain-FDA-Regulated-Products-in-Six-States-Including-Drugs-Devices-Cosmetics-Foods>)  (<http://www.fda.gov/about-fda/website-policies/website-disclaimer>) of the affected products.

"Families rely on stores like Family Dollar for products such as food and medicine. They deserve products that are safe," said Associate Commissioner for Regulatory Affairs Judith McMeekin, Pharm.D. "No one should be subjected to products stored in the kind of unacceptable conditions that we found in this Family Dollar distribution facility. These conditions appear to be violations of federal law that could put families' health at risk. We will continue to work to protect consumers."

This alert covers FDA-regulated products (<https://www.fda.gov/industry/import-basics/regulated-products>) purchased from Family Dollar stores in those six states from Jan. 1, 2021, through the present. Some examples of these products include human foods (including dietary supplements (vitamin, herbal and mineral supplements)), cosmetics (skincare products, baby oils, lipsticks, shampoos, baby wipes), animal foods (kibble, pet treats, wild bird seed), medical devices (feminine hygiene products, surgical masks, contact lens cleaning solutions, bandages, nasal care products) and over-the-counter (OTC) medications (pain medications, eye drops, dental products, antacids, other medications for both adults and children).

Consumers are advised not to use and to contact the company regarding impacted products. The agency is also advising that all drugs, medical devices, cosmetics and dietary supplements, regardless of packaging, be discarded. Food in non-permeable packaging (such as undamaged glass or all-metal cans) may be suitable for use if thoroughly cleaned and sanitized (<https://www.fda.gov/animal-veterinary/animal->

EXHIBIT

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health-literacy/how-handle-food-products-have-been-exposed-filth). Consumers should wash their hands (<https://www.cdc.gov/handwashing/when-how-handwashing.html>) immediately after handling any products from the affected Family Dollar stores.

Consumers who recently purchased affected products should contact a health care professional immediately if they have health concerns after using or handling impacted products. Rodent contamination (<https://www.cdc.gov/rodents/diseases/direct.html>) may cause *Salmonella* and infectious diseases, which may pose the greatest risk to infants, children, pregnant women, the elderly and immunocompromised people.

Following a consumer complaint, the FDA began an investigation of the Family Dollar distribution facility in West Memphis, Arkansas, in January 2022. Family Dollar ceased distribution of products within days of the FDA inspection team's arrival on-site and the inspection concluded on Feb. 11. Conditions observed during the inspection included live rodents, dead rodents in various states of decay, rodent feces and urine, evidence of gnawing, nesting and rodent odors throughout the facility, dead birds and bird droppings, and products stored in conditions that did not protect against contamination. More than 1,100 dead rodents were recovered from the facility following a fumigation at the facility in January 2022. Additionally, a review of the company's internal records also indicated the collection of more than 2,300 rodents between Mar. 29 and Sep. 17, 2021, demonstrating a history of infestation.

Related Information

- Recalls, Market Withdrawals & Safety Alerts (<https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts>)
- Report a Problem to the FDA (<https://www.fda.gov/safety/report-problem-fda>)

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The FDA, an agency within the U.S. Department of Health and Human Services, protects the public health by assuring the safety, effectiveness, and security of human and veterinary drugs, vaccines and other biological products for human use, and medical devices. The agency also is responsible for the safety and security of our nation's food supply, cosmetics, dietary supplements, products that give off electronic radiation, and for regulating tobacco products.

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